

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

NATHANIEL SPENCER III,

Plaintiff,

V.

EXPERIAN INFORMATION
SOLUTIONS, INC.; EQUIFAX, INC.;
TRANS UNION, LLC,

Defendants.

Case No. 1:18-cv-194

Judge Paul L. Maloney

DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE
AN AMENDED COMPLAINT

NOW COMES Defendant Experian Information Solutions, Inc. (“Experian”), by and through its undersigned counsel, and responds to Plaintiff’s Motion for Leave to File an Amended Complaint. Experian does not oppose Plaintiff’s motion for leave to file an amended complaint. Experian, however, does not concede that the substance of the amendments are proper or that they correct the deficiencies in the Plaintiff’s original complaint and reserves its right to assert all appropriate defenses. Contrary to Plaintiff’s certification to the contrary, *see* Docket Entry No. 15, Experian informed Plaintiff that it would not oppose Plaintiff’s motion for leave to file an amended complaint. *See* Exhibit 1.

Dated: April 17, 2018

Respectfully submitted,

/s/ Tamara E. Fraser

Tamara E. Fraser (P51997)

WILLIAMS, WILLIAMS, RATTNER &

PLUNKETT, P.C.

380 N. Old Woodward Avenue, Suite 300

Birmingham, Michigan 48009

(248) 642-0333

tefraser@wwrplaw.com

Autumn Hamit Patterson

Texas Bar No. 24092947

JONES DAY

2727 North Harwood Street

Dallas, TX 75201

Telephone: (214) 969-2966

Facsimile: (214) 969-5100

ahpatterson@jonesday.com

Counsel for Defendant

Experian Information Solutions, Inc.

CERTIFICATE OF SERVICE

A copy of the foregoing was filed on April 17, 2018, with the Court via the CM/ECF system, causing it to be served on all counsel of record. In addition, a copy of the foregoing was sent via mail and email to pro se Plaintiff at the physical address and email address listed below.

Nathaniel Spencer, III
2711 Chaparral St.
Kalamazoo, MI 49006
(269) 599-7808
Nathan.spenc.111@gmail.com

/s/ Tamara E. Fraser
Tamara E. Fraser (P51997)